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7 *Attorneys for Plaintiff U.S. Bank National Association, as Legal Title Trustee for PROF-2013-S3 Legal Title Trust IV*

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MAR 18 2019	
CLERK US DISTRICT COURT	
DISTRICT OF NEVADA	
BY: _____	DEPUTY

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 U.S. BANK NATIONAL ASSOCIATION, AS  
11 LEGAL TITLE TRUSTEE FOR PROF-2013-S3  
12 LEGAL TITLE TRUST IV, a national bank,

13 Plaintiff,

14 vs.

15 ALESSI & KOENIG, LLC., a Nevada limited  
liability company; HIGHLAND RANCH  
16 HOMEOWNERS ASSOCIATION, a Nevada  
corporation; THUNDER PROPERTIES, INC.,  
17 a Nevada corporation; DAYTON P. ROSS, an  
individual; DOES 1 through 10, inclusive, and  
18 ROES 1 through 10, inclusive,

19 Defendants.

20 Case No.: 3:17-cv-00122-MMD-VPC *CBC*

21 **STIPULATION AND ORDER TO**  
**EXTEND DEADLINE FOR**  
**DISPOSITIVE MOTIONS**

22 **(FIRST REQUEST)**

23 Plaintiff, U.S. Bank National Association, as Legal Title Trustee for PROF-2013-S3  
24 Legal Title Trust IV ("Plaintiff" or "U.S. Bank"), Defendant, Thunder Properties, Inc.  
25 ("Thunder"), and Defendant, Highland Ranch Homeowners Association ("Highland Ranch")  
26 (collectively, the "Parties"), by and through their respective attorneys of record, hereby  
27 stipulate and agree as follows:

28 WHEREAS, the Parties are discussing global settlement, and have a reasonable  
expectation that this matter will resolve without expending time and expense on further motion  
practice;

1        WHEREAS, due to the organizational nature of U.S. Bank, and the fact that Highland  
2 Ranch is comprised of a volunteer board, the Parties require additional time to conduct  
3 settlement negotiations;

4        THEREFORE, based on the above:

5        IT IS HEREBY STIPULATED AND AGREED that the dispositive motion deadline  
6 should be continued for 60 days from March 20, 2019 to May 20, 2019, to permit the Parties  
7 additional time to discuss settlement and resolution of all pending claims.

8        IT IS HEREBY STIPULATED AND AGREED that if a global resolution is not  
9 reached prior to the extended dispositive motion deadline, then the parties shall proceed with  
10 dispositive motion practice.

11        This is the Parties' first request for extension of the deadline to file dispositive  
12 motions. This request is not intended to cause any delay or prejudice to any party.

13        IT IS SO STIPULATED AND AGREED.

14        DATED this 14<sup>th</sup> day of March, 2019.

15        WRIGHT, FINLAY & ZAK, LLP

17        /s/ Paterno C. Jurani, Esq.

18        Dana Jonathon Nitz, Esq.  
19        Nevada Bar No. 0050  
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23        Las Vegas, Nevada 89117  
24        *Attorneys for Plaintiff U.S. Bank National  
25        Association, as Legal Title Trustee for PROF-  
26        2013-S3 Legal Title Trust IV*

14        DATED this 14<sup>th</sup> day of March, 2019.

15        ROGER P. CROTEAU & ASSOCIATES,  
16        LTD.

17        /s/ Timothy R. Rhoda, Esq.

18        Roger P. Croteau, Esq.  
19        Nevada Bar No. 4958  
20        Timothy R. Rhoda, Esq.  
21        Nevada Bar No. 7878  
22        9120 West Post Road, Suite 100  
23        Las Vegas, Nevada 89148  
24        *Attorneys for Defendant, Thunder Properties,  
25        Inc.*

1  
2 DATED this 14<sup>th</sup> day of March, 2019.

3 LEACH KERN GRUCHOW ANDERSON  
4 SONG

5 /s/ Karen M. Ayarbe, Esq.  
6 Gayle A. Kern, Esq.  
7 Nevada Bar No. 1620  
8 Karen M. Ayarbe, Esq.  
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11 Reno, Nevada 89511  
12 *Attorneys for Defendant, Highland Ranch  
13 Homeowners Association*

14  
15  
16 STIPULATION AND ORDER TO EXTEND DEADLINE FOR DISPOSITIVE  
17 MOTIONS (FIRST REQUEST)  
18 Case No.: 3:17-cv-00122-MMD-VPC

19  
20 **ORDER**

21  
22 IT IS SO ORDERED.  
23  
24 DATED this 18<sup>th</sup> day of March, 2019.  
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26  
27  
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29  
30   
31 Karen M. Ayarbe  
32 UNITED STATES MAGISTRATE JUDGE